

September 30, 1994

Douglas Stewart, Chief
New Jersey Department of Environmental Protection
Bureau of Environmental Evaluation and Cleanup Responsibility Assessment
401 East State Street
Trenton, NJ 08625

SUBJ: **Hexcel Corporation**
Lodi Borough, Bergen County, New Jersey
ISRA Case No. 86009

Dear Mr. Stewart:

At the request of Edward A. Hogan of Porzio, Bromberg and Newman, the authorized agent for Hexcel Corporation, we are responding to your letter dated September 15, 1994 and received September 22, 1994. We respond to the following paragraph and enumerated conditions as designated in your letter; a copy of your letter is attached for reference.

Second Paragraph, Page 1: The second paragraph of your letter requires Hexcel to obtain all endorsements required for permits needed to install a sewer line within thirty days, or to evaluate the feasibility of utilizing reinjection to ground water or off-site disposal as temporary alternatives until the sewer line can be installed. Please refer to the cover letter from Porzio, Bromberg and Newman which addresses the thirty-day time period for achieving agreements with Fine Organics. Hexcel has evaluated the feasibility of utilizing discharge to ground water for disposal of treated water and determined this to be technically impracticable, providing you a report on the matter entitled "Alternate Discharge of Ground Water Pretreatment System Preliminary Feasibility Study for Former Hexcel Corporation Site", by Heritage Remediation/Engineering Inc., dated March 16, 1992. Additionally, a discharge to ground water would require Fine Organics endorsement on a discharge permit and would impose major construction disruption on Fine Organics' operations. As the construction disruption for a discharge to ground water would be greater than that for our current plan to discharge to the Passaic Valley Sewerage Commissioners (PVSC) sewer, we have every reason to expect that Fine Organics objections and resistance to endorsements would be greater than currently experienced. Accordingly, the discharge to the sewer remains the most likely to succeed and shortest path to achieving a disposal option for treated water.



Off-site disposal of treated water is not practical. It would quickly exhaust the available remediation funds leaving the remainder of the remediation unfunded. This can be readily seen by multiplying fifteen gallons per minute, the design flow rate, by 525,600 minutes per year, by one dollar per gallon, the cost of off-site disposal. Remediation funds would be exhausted within six months. Given the availability of the PVSC discharge, this would seem hardly defensible.

Hexcel has been aggressive in pursuing achievement of discharge to the local sewer. Over the past six months, the following have been achieved:

- A sewer discharge agreement has been negotiated with PVSC. This agreement is orally approved and will be finalized in the form of a permit upon completion of the sewer construction.
- A local Lodi engineer is arranging for a contractor and preparing a proposal to finalize the design and construct the sewer. The purpose in hiring a local engineer and contractor was to avoid the delays that are common when contractors unfamiliar with local construction codes are involved in the project.
- Permit requirements have been researched and updated. Resolution has been achieved on critical permits, such as the TWA permit and sewer extension permit. A stream encroachment permit or waiver of this permit is being sought. The local construction permit generally requires the endorsement of a contractor. This permit has been identified, the application has been prepared and the permit can be acquired quickly upon endorsement by the contractor.
- The treatment system has been inspected, repaired and is being operated on a temporary basis. It is ready for full operation upon opening of the new sewer line. This is discussed further in the response to Item 16.

Response to Enumerated Items

Item 1: Hexcel will resume the dense non-aqueous phase liquids (DNAPL) monitoring in accordance with the DNAPL monitoring plan. This monitoring will be conducted within thirty days. Results will be submitted to you together with such modifications to the approved monitoring plan as may be appropriate after review of the monitoring results. At that time, Hexcel will also submit the results of monitoring that was conducted in May, June and July 1994.

Item 2: Hexcel will submit details on the design of a temporary DNAPL recovery system within thirty days, and additionally, will implement this plan within this time frame. Please be advised that although part of the available recovery plan can be implemented, a

portion of it cannot until Fine Organics allows the construction of piping runs between those wells needing DNAPL recovery and the recovery and treatment system. We have pursued and will continue to aggressively pursue permission to construct these piping runs and have made this a part of a Section 40 request to Fine Organics. The schedule for our activities will be submitted to the NJDEP within thirty days.

Item 3: Hexcel will resume the light non-aqueous phase liquids (LNAPL) monitoring in accordance with the LNAPL monitoring plan. The monitoring will begin within thirty days, with results and appropriate modifications to the existing plan submitted shortly thereafter.

Item 4: Hexcel will resume the LNAPL recovery in accordance with the LNAPL recovery program with one modification. The approved LNAPL recovery plan requires recovery from wells CW-7, RW-15-2, and RW-15-1. As of the last monitoring on July 22, 1994, no product was observed in monitoring well CW-7. Accordingly, LNAPL recovery will be limited to RW-15-2 and RW-15-1 until such time as monitoring in CW-7 indicates the presence of sufficient LNAPL to recover.

Item 5: Hexcel will resume the water level monitoring program within thirty days and submit the results with an alternative proposal for the development of water level data, if appropriate.

Item 6: Hexcel's stated objective is to recover all contaminated ground water that is appropriate to recover based on concentrations and technical capabilities to recover. The area of recovery in the overburden aquifer will be better defined as the final design of the recovery system is made and the hydraulic analysis stemming from the pilot test is completed. The NJDEP's desire for ground water remediation in the vicinity of well MW-1 has been noted and is included in the hydraulic analysis and design process of the recovery system.

Item 7: Hexcel will be following Section 40 procedures to obtain access to a location for the ground water sample on the opposite side of the Saddle Brook River. Additionally, we will provide the NJDEP with details of the water sampling technique to be used.

Item 8: No response necessary.

Item 9: Hexcel respectfully reiterates its request for an extension of time to install the bedrock monitoring well in the vicinity of MW-1, and to that end, is providing here what additional information is available to substantiate the assertion that hydraulic control of the overburden aquifer is warranted before the installation of this bedrock monitoring well. As the NJDEP knows, there is an important barrier comprised of clay that impedes the substantial ground water contamination in the shallow overburden soils from

penetrating to a prolific aquifer located beneath the barrier. Unfortunately, this barrier appears to have thinned in the vicinity of MW-1. We believe that the presence of contamination in MW-1, a well monitoring the deeper aquifer, may be a result of cross-contamination caused by the installation of this well. If we are correct, the NJDEP in requiring us to install a bedrock monitoring well at this location is requiring us to take a significant risk of spreading contamination into deeper aquifers for the sake of shaving approximately one year off the installation schedule. This well is not relevant to the central focus of the remediation, and the one-year delay of installation has no effect on the timing of more significant portions of the remediation. The assumption of risk by Hexcel is unwarranted until safer conditions can be established for the construction of the well.

We further add that the State of New Jersey has seen many examples of installations of deep wells which penetrated layered systems and in the process served to negate the benefits these systems have in protecting lower aquifers. This has resulted in the State requiring standard well designs and procedures for drillers for both well installations and exploratory borings in an attempt to prevent uncontrolled drilling and resulting cross-contamination. We most strongly request that the NJDEP follow its own policy and allow us sufficient time to install under the safest conditions what must be considered a well peripheral to the central thrust of the remediation. The NJDEP should not negate Hexcel's efforts to prevent cross-contamination of the deeper aquifers.

Item 10: Hexcel will obtain the four sediment samples at the storm sewer discharge point and at intervals of 10 feet, 20 feet and 30 feet downstream. These samples will be obtained from near the bank within wading distance of the shore using hand core samplers. The samples will be analyzed for PCBs, total organic carbon and grain size. Results will be submitted along with available details of the transformer identified in the NJDEP report of inspection dated September 15, 1986. The report will comply with the technical requirements for site remediation. Additionally, the NJDEP "Guidance for Sediment Quality Evaluation" will be used to evaluate the results.

Item 11: This request for increase in the funding source for financial assurance is the subject of a separate correspondence from Porzio, Bromberg and Newman.

Item 12: See accompanying cover letter.

Item 13: All permits to operate the ground water and DNAPL recovery and treatment systems have been obtained with the exception of a stream encroachment permit and local building permit, both required for the construction of a sewer line to allow discharge to the PVSC sewer system. Both these permits require the endorsement of the property owner, Fine Organics. The soil vapor extraction system may require an air discharge permit which cannot be applied for until completion of the design of the vapor extraction system.

Item 14: The requested disposal documentation will be submitted within thirty days.

Item 15: The requested update on disposal of waste will be submitted within thirty days.

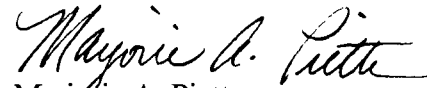
Item 16: The treatment and proper disposal of basement seepage water was resumed approximately four months ago. Temporary storage of basement water and partially treated water was required while the treatment system was refurbished and brought back on-line. As of this date, all basement seepage water, whether temporarily stored or recently received in the basement, has been treated other than small quantities currently undergoing treatment. The treated water has been disposed of at the DuPont, Deepwater, treatment plant. The response to Item 14 will include the documentation of all the treated water disposed of at the treatment facility. The site's treatment system is fully operational and able to handle any new basement seepage water that will be received in the coming months.

Item 17: The requested schedule will be submitted within thirty days of receipt of the NJDEP's September 15, 1994 letter.

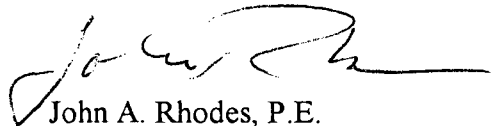
We trust the above is an adequate response to your letter. Please call if we can provide additional information.

Sincerely,

GEO ENGINEERING, INC.



Marjorie A. Piette
Project Manager



John A. Rhodes, P.E.
Vice President

JAR/MAP/avm